

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE:

LISA ANN THOMPSON : 06-50515 WESTERN DISTRICT
Debtor : LOUISIANA

LISA ANN THOMPSON :
Plaintiff : ADVERSARY NO. 08-00607-PWB

Vs. :

MANN BRACKEN LLC :
Defendant :

**NOTICE OF HEARING ON MOTION TO STAY ISSUANCE OF JUDGMENT AND
ENFORCEMENT OF JUDGMENT**


PLEASE TAKE NOTICE that Mann Bracken LLC has filed a Motion to Stay Issuance of Judgment and Enforcement of Judgment and related papers with the Court seeking an order staying the issuance and enforcement of a judgment.

PLEASE TAKE FURTHER NOTICE that the Court will hold a hearing on this Motion in Courtroom 1401 Richard Russell Federal Building, 75 Spring Street, Atlanta, GA 30303 at **10:00 a.m on September 16, 2008.**

Your rights may be affected by the Court's ruling on these pleadings. You should read these pleadings carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.) If you do not want the court to grant the relief sought in these pleadings or if you want the court to consider your views, then you and/or your attorney must attend the hearing. You may also file a written response to the pleading with the Clerk at the address stated below, but you are not required to do so. If you file a written response, you must attach a certificate stating when, how, and on whom (including addresses) you served the response. Mail or deliver your response so that it is received by the Clerk at least two business days before the hearing. The address of the Clerk's Office is: Clerk, U.S. Bankruptcy Court, Room 1340, Richard Russell Federal Building, 75 Spring Street, Atlanta,

GA 30303. You must also mail a copy of your response to the undersigned at the address stated below.

Dated: September 3, 2008



William J. Layng, Jr. Bar No. 441550
Attorney for Movant
South Terraces, Suite 1000
115 Perimeter Center Place
Atlanta, GA 30346
678-578-3578
blayng@penderlaw.com

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:

LISA ANN THOMPSON
Debtor

: 06-50515 WESTERN DISTRICT
: LOUISIANA

LISA ANN THOMPSON
Plaintiff

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: ADVERSARY NO. 08-00607-PWB
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Vs.

MANN BRACKEN LLC
Defendant

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:
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**MOTION TO STAY ISSUANCE OF JUDGMENT
AND ENFORCEMENT OF JUDGMENT**

Comes now Mann Bracken LLC, the defendant herein, and moves this Court for an order staying the issuance of judgment and enforcement of judgment requested by the plaintiff in this adversary proceeding. In support of its motion Mann Bracken LLC shows the Court the following:

1.

The plaintiff filed chapter 7 bankruptcy case number 06-50515 in the Western District of Louisiana on July 6, 2006.

2.

On July 17, 2007, the plaintiff filed a Motion for Contempt Sanctions and Costs against Bank of America and Mann Bracken LLC. On October 19, 2007, the Court entered an order granting the plaintiff's Motion for Contempt Sanctions and Costs.

3.

On August 25, 2008, the plaintiff filed the above adversary for Certification of Judgment Registration in Another District.

4.

On August 19, 2008, defendant filed a Motion to Reopen the plaintiff's chapter 7 case for the purpose of setting aside the judgment entered against it on October 19, 2007. Costs to reopen the plaintiff's case were paid in August 19, 2008 and per the Court's request the Motion to Reopen was refiled on August 28, 2008. See exhibit "A" attached hereto.

5.

The defendant believes that it has grounds for the October 19, 2007 judgment entered against it to be vacated. This Court should stay issuance of a judgment and enforcement of any judgment against the defendant until these issues are resolved in the Western District of Louisiana.

WHEREFORE, Defendant prays that its Motion to Stay Issuance of Judgment and Enforcement of Judgment be granted and that Defendant have such other and further relief as this Court deems to be just and proper.

This the 3 day of September 2008.

/s/ William J Layng, Jr.
William J Layng, Jr. Bar No. 441550
Pendergast & Jones, P.C.
Attorneys for Defendant
South Terraces, Suite 1000
115 Perimeter Center Place
Atlanta, GA 30346
678-578-3578
blayng@penderlaw.com

EXHIBIT "A"

File a Motion or Application:

06-50515 Lisa Ann Thompson CASE CLOSED on 02/29/2008

Type: PK

Chapter: 7 v.

Office: 4 (Lafayette Opelousas)

Judge: RRS

Assets: n

Disp: Standard Discharge

Case Flag: MEANSNO: Closed

U.S. Bankruptcy Court**Western District of Louisiana****Notice of Electronic Filing**

The following transaction was received from W. Simmons Sandoz entered on 8/19/2008 at 11:49 AM
 CDT and filed on 8/19/2008.

Case Name: Lisa Ann Thompson

Case Number: 06-50515

WARNING: CASE CLOSED on 02/29/2008

Document Number: 60

Docket Text

Motion to Reopen Chapter 7 Case with Certificate of Service. Fee Amount Due \$260 Filed by W.
 Simmons Sandoz on behalf of Mann Bracken (Sandoz, W.)

The following document(s) are associated with this transaction:

Document description: Main Document**Original filename:** F:\WP5\Parterney.pdf [thompson.pdf]**Electronic document Stamp:**

[STAMP: bkecfStamp ID=1011648726 Date=8/19/2008] [FileNumber=10496804

0] [aa1d515e7aa3e6e38f0556e0d688d23e38e0f7e-ed8078f26e328e6a1d8f09a12

e851f9c4b779b6668e3778c674b11b25d83094fde8e45952012acc2e78e510]]

06-50515 Notice will be electronically mailed to:

Henry B. Bonin notice@bkcyllaw.com

Paul N. DeBaillon Paul.DeBaillon@psnet.com LA02@ECFCBIS.COM

Kevin J. Payne bknotice@tlclex.com

Erin M. Ramsey erinotices@ascensioncapitalgroup.com

Office of U. S. Trustee USTPRRegion05-SHLCF@usdoj.gov

William C. Vidrine williamv@vidrinelaw.com

06-50515 Notice will not be electronically mailed to:

Mann Bracken
c/o W. Simmons Sandoz
P.O. Box 471
Opelousas,, LA 70571-0471

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE-OPELOUSAS DIVISION

IN RE: LISA ANN THOMPSON
Debtor

CASE NO. 06-50515

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APPLICATION TO REOPEN CASE

NOW INTO COURT THROUGH UNDERSIGNED COUNSEL COMES MANN BRACKEN, LLC who with respect represents:

1.

This Chapter 7 proceeding was filed on the 6th day of July, 2006.

2.

The discharge was granted on the 30th day of October, 2006.

3.

The case was closed on the 29<sup>th</sup> day of February, 2008.

4.

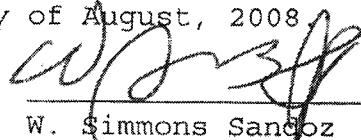
An Order was entered on April 19, 2007 holding Mann Bracken, LLC and Bank of America in contempt of court. The Judgment was obtained in the nature of a default. Mann Bracken, LLC did not participate in the hearing. Mann Bracken, LLC previously represented Bank of America pre bankruptcy in the collection of indebtedness due. Bank of America was also held in contempt of court pursuant to court order. Bank of America filed an application to vacate that order and were successful in part. There was much confusion in this matter as there were two motions for contempt and various hearings regarding this issue.

Mann Bracken, LLC desires to reopen the case for the purpose of vacating and/or rescinding the court order dated April 19, 2007.



WHEREFORE MANN BRACKEN, LLC PRAYS that the case be reopened for the purpose of vacating and/or rescinding the court order dated April 19, 2007.

Opelousas, Louisiana this 19th day of August, 2008

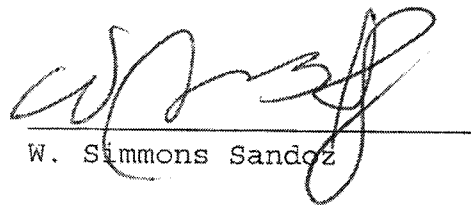


W. Simmons Sandoz  
Attorney for Mann Bracken  
Bar Roll #11711  
P.O. Drawer 471  
Opelousas, LA 70571-0471  
(337) 942-8956

CERTIFICATE

I hereby certify that a copy of the above and foregoing Application to Reopen Case has been mailed to the U.S. Trustee, 300 Fannin St., Ste. 3196, Shreveport, Louisiana, 71101, by first class mail, postage pre-paid on the date set forth below.

Opelousas, Louisiana this 19th day of August, 2008.



W. Simmons Sandoz

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE-OPELOUSAS DIVISION

IN RE: LISA THOMPSON  
Debtor

CASE NO. 06-50515

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ORDER

Considering the Application to Reopen Case and it appearing in the premises:

IT IS ORDERED that the case be and it is hereby reopened upon the payment of the filing fee of \$260.00.

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This order was prepared and is being submitted by:
Sandoz Law Office

By: W. Simmons Sandoz

Attorney for Mann Bracken, LLC

Bar No. 11711

P.O. Box 471

Opelousas, LA 70571

Phone: (337) 942-8956

Fax: (337) 942-5448

U.S. Bankruptcy Court
Western District of Louisiana
Internet Payment History for Sandoz , W. Simmons
8/19/2008 to 8/19/2008

Date Paid	Description	Payment Method	Receipt #	Amount
2008-08-19 11:50:41	Lisa Ann Thompson Motion to Reopen Chapter 7 Case(06-50515) [motion,mreop7] (260.00)	credit card	5833789	\$ 260.00

**U.S. Bankruptcy Court
Western District of Louisiana**

Thank you. Your transaction in the amount of \$ **260.00** has been completed.

Please print a copy of your transaction receipt for future reference. The transaction number is **5833789**.

Detail description:

Motion to Reopen Chapter 7 Case(06-50515) [motion,mreop7] (260.00)

Close window

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

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LISA ANN THOMPSON
Debtor

: 06-50515 WESTERN DISTRICT
: LOUISIANA

LISA ANN THOMPSON
Plaintiff

:
: ADVERSARY NO. 08-00607-PWB
:

Vs.

MANN BRACKEN LLC
Defendant

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CERTIFICATE OF SERVICE

This is to certify that on the 3 day of September 2008 I served a copy of the foregoing Motion to Stay Issuance of Judgment and Enforcement of Judgment and Notice of Hearing on the following by placing a copy of same in the United States mail in a properly address and stamped envelope to:

Joe Perry Redd
1959-G Parker Court
Stone Mountain GA 30087

Lisa Ann Thompson
1277 Hwy 754
Sunset LA 70584

William C Vidrine
711 West Pinhook Road
Lafayette LA 70503

Executed on: 9-3-08

By: /s/ William J Layng, Jr.